



Montana Department of
ENVIRONMENTAL QUALITY

Brian Schweitzer, Governor

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March 28, 2011

Rebecca Thomas
Remedial Project Manager
EPA Region 8
1595 Wynkoop Street
8EPR-SR
Denver, CO 80202-1129

RE: Remediation of the David Thompson Search and Rescue Building, Operable Unit 1, Libby
Asbestos Superfund Site

Dear Ms. Thomas;

The Montana Department of Environmental Quality (DEQ) requests the United States Environmental Protection Agency (EPA) perform a thorough interior cleaning of the David Thompson Search and Rescue Building (S&R building) as part of the remedial actions planned for Operable Unit (OU) 1. DEQ recommends the soil across the area be removed/capped as appropriate; a thorough interior cleaning of the S&R building be completed; and then aggressive clearance sampling inside the building be performed, consistent with the current process executed inside residential/commercial buildings in OU4. Clearance samples should be non-detect for Libby amphibole asbestos (LA) fibers to consider the remedial action complete.

Part 1, Declaration of the Record of Decision (ROD) for OU1 states:

"However, a site-wide risk assessment has not yet been completed; and, in the absence of established cleanup levels and with some exceptions, *EPA is removing and/or capping all visible vermiculite and any detection of LA.*" (Italic emphasis added)

The DEQ concurred with the ROD through which EPA would sever all complete pathways of exposure, regardless of the concentrations of LA, given there is no toxicity value for LA. Attached please find excerpts from the OU1 ROD which clearly states there are LA fibers present inside the S&R building.

The DEQ looks forward to receipt of a complete Remedial Action Work Plan to include a description of remedial action to clean the interior of the S&R building. Thank you for your attention to this matter. If you have any questions or concerns, please feel free to contact me at lscusa@mt.gov or (406) 841-5035.

Sincerely,

Larry Scusa, Manager
Federal Superfund Section
Encl: Attachment

5.2.1 Source Materials

Vermiculite and/or vermiculite concentrate was transported to OU1 from the mine for stockpiling and staging prior to distribution. It is also believed that vermiculite materials were used to fill in low lying areas of the site. The potential contaminated media of concern for OU1 include: indoor air, dust in air of vehicles, outdoor air near disturbed soil, general (ambient) outdoor air, and dust in air from disturbances of roofing or other outdoor surfaces.

Specific sources of contamination as described in the RI include the following:

- Surface soil within the OU1 boundary contains visible vermiculite and also LA at ND, trace, or <1% levels.
- Subsurface soil is known to contain vermiculite, the exact location and depths of vermiculite containing soil are not fully documented or delineated.
- LA has been observed in indoor air and indoor dust samples at the search and rescue support building
- LA has been observed in indoor air at the site collected during ABS activities within the garage and meeting room areas of the search and rescue support building.
- LA has been observed in outdoor ambient air samples collected near OU1.
- LA has been observed in personal air samples collected during bush hogging activities within the boundary of OU1.

5.2.2 Affected Media

Affected media at OU1 are soil and air.

- **Soil.** Soil has been impacted by the migration of contaminants via airborne transport of contaminated dust, runoff of contaminated surface water, or mechanical transportation of source materials.
- **Air.** Ambient air has been impacted in the past by airborne transport of exposed LA contamination in soils and transport of LA from vermiculite processed at the OU.

5.2.3 Migration Routes and Exposure Pathways

As discussed in Section 2, LA has been observed in all the media sampled at the site (i.e., indoor air, indoor dust, outdoor ambient air, outdoor air near disturbed soil, and soil). Exposure to LA can be either by incidental ingestion of contaminated soil or by inhalation of air that contains LA fibers. Of these two pathways, inhalation exposure resulting from active soil disturbance is believed to be the most significant. The added risk from the ingestion pathway is expected to be small compared to the risk from the